

## **APPENDIX A**

**Notice of Intent to Remediate and  
Associated Receipts**

March 13, 2003

*Via Federal Express*

Mr. S. Craig Lobins  
Environmental Cleanup Program Regional Manager  
Pennsylvania Department of Environmental Protection  
Northwest Region Office  
230 Chestnut Street  
Meadville, PA 16335-3481

**RE: Notice of Intent to Remediate  
Bear Creek Area Chemical Site**

Dear Mr. Lobins:

Pursuant to the Land Recycling and Environmental Remediation Standards Act ("Act 2"), Beazer East, Inc. ("Beazer") and INDSPEC Chemical Corporation ("INDSPEC") hereby submit to the Pennsylvania Department of Environmental Protection ("PADEP") in duplicate a Notice of Intent to Remediate ("NIR") for the INDSPEC Chemical Corporation property located in Petrolia, Pennsylvania, and adjacent property owned by Beazer East, Inc. A copy of the NIR will be sent to the Fairview Township Board of Supervisors and the Borough of Petrolia. Public notification of the NIR submission will be made through the publication of a legal notice in the *Butler Eagle* on or around February 27, 2003. Proof of the municipal and public notification will be provided to the PADEP once received by Beazer and INDSPEC.

If you have any questions regarding this submittal or require additional information, please contact me at (412) 208-8805. Thank you.

Sincerely,

**Beazer East, Inc.**

Michael D. Tischuk, P.E.  
Environmental Manager

Enclosures

cc: Mr. George Luxbacher



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## NOTICE OF INTENT TO REMEDIATE

Property Name INDSPEC Chemical Corporation Facility

Address/Location Route 268 Main St.

City Petrolia Zip Code 16050

Municipality (if more than one, list all) Fairview Township and Borough of Petrolia

County Butler County

Latitude 41 ° 01 ' 07 " Longitude 79 ° 43 ' 01 "  
(Indicate the latitude and longitude in degrees, minutes, and seconds).

Size of property 325 acres

Number of "Sites" (areas of contamination) addressed by this NIR Entire Property

For each site identified above, provide information below

Site Identifier	Size, acres
Entire Plant Property	325 acres

Remediation: See Technical Guidance Manual, Section I ([www.dep.state.pa.us](http://www.dep.state.pa.us), DirectLink "Land Recycling") for advice on determining how to complete the sections below:

Standards or special industrial area proposed for attainment. (Can use multiple)

☒ Background ☒ Statewide Health ☒ Site-specific ☐ Special Industrial Area

Proposed land use ☐ Residential ☒ Non-residential

Categories of contaminants known to date that are proposed to be addressed under this NIR. (check all that apply)

### List of Categories of Contaminants in Soils

CODE	DESCRIPTION	CODE	DESCRIPTION
<input type="checkbox"/> AVGAS	Aviation Gasoline	<input type="checkbox"/> LDGAS	Leaded Gasoline
<input type="checkbox"/> CLSOL	Chlorinated Solvents	<input type="checkbox"/> LEAD	Lead
<input type="checkbox"/> DIESEL	Diesel Fuel	<input type="checkbox"/> MTBE	MTBE
<input type="checkbox"/> FO1	Fuel Oil No 1	<input type="checkbox"/> NMO	New Motor Oil
<input type="checkbox"/> FO2	Fuel Oil No 2	<input checked="" type="checkbox"/> OTORG	Other Organics
<input type="checkbox"/> FO4	Fuel Oil No 4	<input type="checkbox"/> PAH	PAH
<input type="checkbox"/> FO5	Fuel Oil No 5	<input type="checkbox"/> PCB	PCB
<input type="checkbox"/> FO6	Fuel Oil No 6	<input type="checkbox"/> PEST	Pesticides
<input checked="" type="checkbox"/> INORG	Inorganics	<input type="checkbox"/> ULGAS	Unleaded Gasoline
<input type="checkbox"/> JET	Jet Fuel	<input type="checkbox"/> UMO	Used Motor Oil
<input type="checkbox"/> KERO	Kerosene		



## List of Categories of Contaminants in Groundwater

CODE	DESCRIPTION	CODE	DESCRIPTION
<input type="checkbox"/> AVGAS	Aviation Gasoline	<input type="checkbox"/> LDGAS	Leaded Gasoline
<input type="checkbox"/> CLSOL	Chlorinated Solvents	<input type="checkbox"/> LEAD	Lead
<input type="checkbox"/> DIESEL	Diesel Fuel	<input type="checkbox"/> MTBE	MTBE
<input type="checkbox"/> FO1	Fuel Oil No 1	<input type="checkbox"/> NMO	New Motor Oil
<input type="checkbox"/> FO2	Fuel Oil No 2	<input checked="" type="checkbox"/> OTORG	Other Organics
<input type="checkbox"/> FO4	Fuel Oil No 4	<input type="checkbox"/> PAH	PAH
<input type="checkbox"/> FO5	Fuel Oil No 5	<input type="checkbox"/> PCB	PCB
<input type="checkbox"/> FO6	Fuel Oil No 6	<input type="checkbox"/> PEST	Pesticides
<input checked="" type="checkbox"/> INORG	Inorganics	<input type="checkbox"/> ULGAS	Unleaded Gasoline
<input type="checkbox"/> JET	Jet Fuel	<input type="checkbox"/> UMO	Used Motor Oil
<input type="checkbox"/> KERO	Kerosene		

Check all that apply. This site is part of the following Programs:

- ☐ Key Site
 ☐ Enterprise Zone  
☐ Multi-site Agreement; Date \_\_\_\_\_
 ☐ Keystone Opportunity Zone

## Administrative

Industrial Sites Reuse Program ☐ Yes ☒ No. If yes, name of applicant: \_\_\_\_\_

(IF KNOWN) Will this site, now or in the future, be part of a nonuse aquifer determination request? (see Pa Code Section 250.303). ☐ Yes ☒ No

Anticipated Date of Submission of Plan or Final Report: 2008 \_\_\_\_\_

## Special Industrial Area sites only:

Ownership History (as required by 25 Pa Code §250.502)

## Special Industrial Area sites only:

Narrative-Description of project being undertaken, including the proposed remediation:

Newspaper used for Notice: Butler Eagle

Anticipated Newspaper publishing date: February 27, 2003

Remediator/Property Owner/Consultant. For each of these, complete form below. These persons will be recipients of the approval of the final report.

Remediator
Contact Person: Michael Tischuk
Relationship to site (e.g. owner, remediator, participating in cleanup, consultant): Remediator/Former Owner/Owner
Phone Number: 412 208-8800
Company Name: Beazer East, Inc.
Address: c/o Three Rivers Management
Address: Suite 3000, One Oxford Centre, Pittsburgh, PA 15219

<b>Property Owner</b>
Contact Person: George Luxbacher
Relationship to site (e.g. owner, remediator, participating in cleanup, consultant): Remediator/Owner
Phone Number: 859 543-2159
Company Name: INDSPEC Chemical Company
Address: c/o Glenn Spring Holdings, Inc. 2480 Fortune Drive, Suite 300, Lexington, KY 40509-4125
Address:
<b>Consultant</b>
Contact Person:
Relationship to site (e.g. owner, remediator, participating in cleanup, consultant):
Phone Number:
Company Name:
Address:
Add more as needed

**Preparer of Notice of Intent to Remediate:**

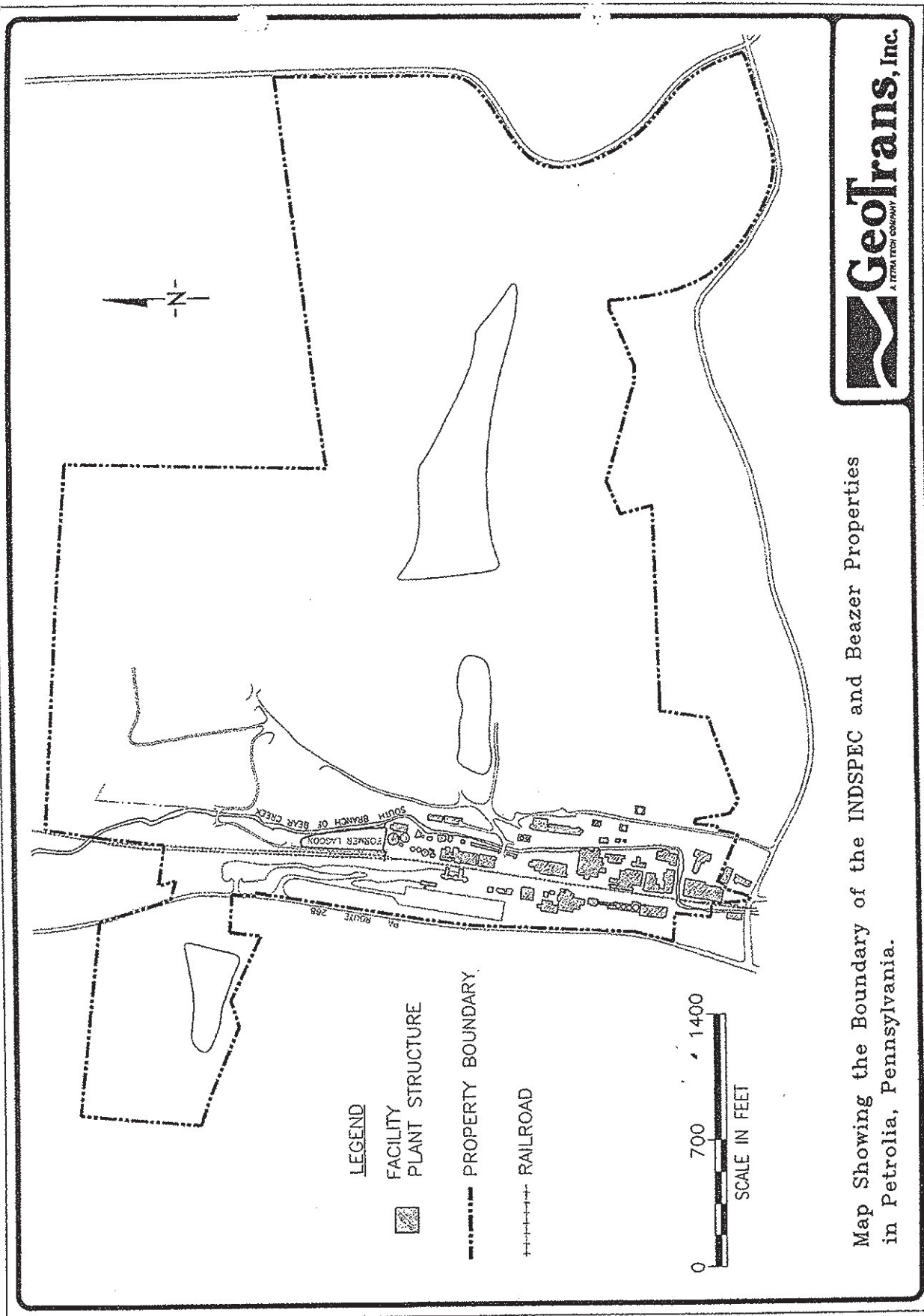
Name: Michele M. Gutman

Title: Attorney

Address: Babst, Calland, Clements &amp; Zomnir

Telephone: 412 394-5425

**Submission of Image File of Site Map showing property lines and general area of site(s) to be remediated. (email to: [landrecycling@state.pa.us](mailto:landrecycling@state.pa.us))**



[illegible]



The Eagle Printing Co.  
114-116 West Diamond Street  
P.O. Box 271  
Butler, Pennsylvania 16003



**Butler Eagle**

THE EAGLE IS THE ONLY  
DAILY NEWSPAPER  
PUBLISHED IN  
BUTLER COUNTY

PUBLISHED BY EAGLE PRINTING COMPANY

Area 724-282-8000

PLEASE RETURN THIS PORTION WITH YOUR REMITTANCE

DATE	04/08/03
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TOTAL AMOUNT DUE	149.00
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ENTER AMOUNT PAID	
-------------------	--

ACCOUNT NAME

BABST, CALLAND, CLEMENTS & ZOMNIR, P.C. TWO GATEWAY CENTER, 8TH F PITTSBURGH, PA 15222
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ACCOUNT NUMBER	9977
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DATE	DESCRIPTION	S.A.U.	TIMES	UNITS CHGD	RATE	CHARGES	CREDITS
04/08	BEAZER EAST, INC	10X 98.00	1	98.00	1.500	147.00	
04/08	PROOF OF PUBLICATION	0X 0.00	1	0.00	2.000	2.00	
<b>Butler Eagle</b> <b>Eagle Weeklies</b>							
<div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>RECEIVED</b>  APR 21 2003 </div>							
ACCOUNT NAME	BABST, CALLAND, CLEMENTS	<b>TOTALS</b>		98.00		149.00	.00

NOTE: - ALL ACCOUNTS AT THE EAGLE OFFICE ARE BILLED MONTHLY. IN CASE OF ERROR OR MISUNDERSTANDING NOTIFY US AT ONCE.

DATE	04/08/03
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PREVIOUS BALANCE	-	PAYMENTS/CREDITS	=
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UNPAID BALANCE	+	SERVICE CHARGE	=
----------------	---	----------------	---

NEW CHARGES	+	TOTAL AMOUNT DUE	149.00
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YOU MAY DEDUCT \$

FROM THE TOTAL DUE ONLY IF PAID BY  
AND HAVE  
A CURRENT BALANCE - ONLY - -  
OTHERWISE - - NET 30.

The Eagle Printing Co.

ACCOUNT STATUS		
CURRENT	30 DAYS	OVER 90 DAYS

ACCOUNT NUMBER	9977
----------------	------



BABST | CALLAND | CLEMENTS | ZOMNIR  
A PROFESSIONAL CORPORATION

MICHELE M. GUTMAN  
Attorney at Law  
T 412.394.5425  
mgutman@bccz.com

April 4, 2003

**CERTIFIED MAIL –**  
**RETURN RECEIPT REQUESTED**

Karl Rottman, Chairman  
Fairview Township Board of Supervisors  
Fairview Township Municipal Building  
1571 Hooker Road  
Karns City, PA 16041

**RE: Notice of Intent to Remediate**  
**Bear Creek Area Chemical Sites (INDSPEC Chemical Corporation Property**  
**and Adjacent Beazer East, Inc. Property)**

Dear Mr. Rottman:

The Land Recycling and Environmental Remediation Standards Act ("Act 2") requires that a Notice of Intent to Remediate ("NIR") be provided to the municipality in which a site is located that has been proposed to be remediated to a site-specific standard. In addition, Act 2 allows the municipality a 30-day comment period. In accordance with the provisions of Act 2, INDSPEC Chemical Corporation ("INDSPEC") and Beazer East, Inc. ("Beazer") are formally notifying you of our intent to remediate the above referenced property ("INDSPEC/Beazer Property"). INDSPEC and Beazer plan to use one or a combination of Act 2's background, statewide health or site-specific standards to accomplish the remediation of the INDSPEC/Beazer Property. A copy of the Notice of Intent to Remediate, which has been sent to the Department of Environmental Protection, ("DEP") is enclosed. This notice will be published in the Pennsylvania Bulletin, and a summary of the notice will appear in the *Butler Eagle* on or around April 8, 2003.

Act 2 provides for a 30-day public comment period for site-specific standard remediations. The 30-day public comment period is initiated with the publication of the summary of the NIR in the *Butler Eagle*. During this period, Fairview Township may submit a request to INDSPEC and Beazer to be involved in the development of the remediation plan for the INDSPEC/Beazer Property. Fairview Township may also submit a request to INDSPEC and Beazer during this 30-day comment period to develop and implement a public involvement plan.

Karl Rottman, Chairman  
April 4, 2003  
Page 2

Any comments or requests should be sent to:

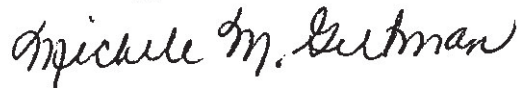
George Luxbacher  
Vice-President, Operations  
Glenn Springs Holdings, Inc.  
2480 Fortune Drive, Suite 300  
Lexington, KY 40509-4125

Michael Tischuk  
Beazer East, Inc.  
One Oxford Centre, Suite 3000  
Pittsburgh, PA 15219

Copies of the same should be sent to the Pennsylvania Department of Environmental Protection at their Northwest Regional Office at 230 Chestnut Street, Meadville, Pennsylvania, 16335-3481, to the attention of Mr. S. Craig Lobins.

Thank you for your consideration of this matter.

Yours truly,



Michele M. Gutman

MMG/vlc  
Enclosure

cc: Michael D. Tischuk (w/encl.)  
George Luxbacher (w/encl.)  
Joel L. Lennen, Esquire (w/encl.)  
S. Craig Lobins (w/encl.- via Certified Mail)



## **NOTICE OF INTENT TO REMEDIATE**

Pursuant to the Land Recycling and Environmental Remediation Standards Act, the Act of May 19, 1995, P.L. 4, No. 1995-2, notice is hereby given that INDSPEC Chemical Corporation ("INDSPEC") and Beazer East, Inc. ("Beazer") have submitted to the Pennsylvania Department of Environmental Protection a Notice of Intent to Remediate certain property owned by INDSPEC and Beazer located in Petrolia Borough, Fairview Township, Butler County with a street address of Route 268, Main Street, Petrolia, PA 16050 ("site" or "INDSPEC/Beazer Property"). This Notice of Intent to Remediate states that the site is a manufacturing facility and adjacent property. The site has been found to be contaminated with "inorganic" materials and other "organic materials" which have or are suspected of contaminating soil and groundwater on the site. The proposed remediation measures have not been selected, but may include one or more of the following: institutional controls; groundwater monitoring; and/or capping or removal of contaminated media. The proposed future use of the INDSPEC/Beazer Property will be non-residential.

INDSPEC and Beazer plan to use one or more of the following standards: background, statewide health and/or site-specific for the constituents present to accomplish the remediation of the site. The Act provides for a 30-day public comment period for site-specific standard remediations. That 30-day public comment period is initiated with the publication of this notice. During this period, the municipalities in which the INDSPEC/Beazer Property is located may submit a request to INDSPEC and Beazer to be involved in the development of the remediation for the site. The municipalities may also submit a request to INDSPEC and Beazer during this 30-day comment period to develop and implement a public involvement plan. Requests or comments should be sent to INDSPEC Chemical Corporation, c/o Glenn Springs Holdings, Inc. 2480 Fortune Drive, Suite 300, Lexington, KY 40509-4125, to the attention of Mr. George Luxbacher and Beazer East, Inc., c/o Three Rivers Management, Inc. One Oxford Centre, Suite 3000, Pittsburgh PA 15219, to the attention of Mr. Michael Tischuk. Copies of these requests and of any comments also should be submitted to the Pennsylvania Department of Environmental Protection at the Northwest Regional Office at 230 Chestnut Street, Meadville, Pennsylvania 16335-3481 to the attention of Mr. S. Craig Lobins.



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Karl Rottman, Chairman  
Fairview Township Board of Superv.  
Fairview Twp. Municipal Bldg.  
1571 Hooker Road  
Karns City, PA 16041

7777-13100

2. Article Number

(Transfer from service label)

7099 3220 0007 4859 5758

PS Form 3811, March 2001

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Paul E. Don* B. Date of Delivery *4/01/03*

C. Signature

X *Paul E. Don*

☐ Agent

☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☒ No

3. Service Type

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☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

Domestic Return Receipt



192595-01-M-1424



BABST | CALLAND | CLEMENTS | ZOMNIR  
A PROFESSIONAL CORPORATION

MICHELE M. GUTMAN  
Attorney at Law  
T 412.394.5425  
mgutman@bccz.com

April 4, 2003

**CERTIFIED MAIL –**  
**RETURN RECEIPT REQUESTED**

Ms. Margaret Merryman  
Secretary, Petrolia Borough  
P.O. Box 333  
Petrolia, PA 16050

Mr. Fred Angiolieri  
Manager, Petrolia Borough  
P.O. Box 333  
Petrolia, PA 16050

**RE: Notice of Intent to Remediate**  
**Bear Creek Area Chemical Sites (INDSPEC Chemical Corporation Property**  
**and Adjacent Beazer East, Inc. Property)**

Dear Ms. Merryman and Mr. Angiolieri:

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Ms. Margaret Merryman  
Mr. Fred Angiolieri  
April 4, 2003  
Page 2

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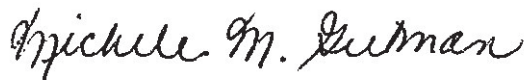
George Luxbacher  
Vice President, Operations  
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2480 Fortune Drive, Suite 300  
Lexington, KY 40509-4125

Michael Tischuk  
Beazer East, Inc.  
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Thank you for your consideration of this matter.

Yours truly,



Michele M. Gutman

MMG/vlc  
Enclosure

cc: Mitchell D. Brouman (w/encl.)  
George Luxbacher (w/encl.)  
Joel L. Lennen, Esquire (w/encl.)  
S. Craig Lobins (w/encl. - via Certified Mail)



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

McSCraig Lobins  
Environ. Cleanup Program Reg. Manager  
PA DEP  
Northwest Region Office  
230 Chestnut Street  
Meadville, PA 16335-3481  
7777-13100

2. Article Number

(Transfer from service label)

7099 3220 0007 4859 5741

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

DEP/SCWalter

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

4-7-03

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Margaret Merryman  
Secretary, Petrolia Borough  
P.O. Box 333  
Petrolia, PA 16050

Ref. # 7777-13100

2. Article Number

(Transfer from service label)

7099 3220 0007 4859 5734

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424

## COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Regmerryman

B. Date of Delivery

04-07-03

C. Signature

X Regmerryman

☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

## SENDER: COMPLETE THIS SECTION

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- Attach this card to the back of the mailpiece, or on the front if space permits.

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Mr. Fred Angiolieri  
Manager, Petrolia Borough  
P.O. Box 333  
Petrolia, PA 16050

Ref. # 7777-13100

2. Article Number

(Transfer from service label)

7099 3220 0007 4859 5727

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424

## COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Fred Angiolieri

B. Date of Delivery

4-7-03

C. Signature

X Fred Angiolieri

☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

**PADEP Review Letter to  
2009 Remedial Investigation Report**



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NORTHWEST REGIONAL OFFICE

RECEIVED JUN 03 2010

June 2, 2010

**CERTIFIED MAIL NO. 7009 1680 0000 9456 3303**

Mr. Michael D. Tischuk  
Environmental Manager  
Beazer East, Inc.  
1 Oxford Center, Suite 3000  
Pittsburgh, PA 15219-6401

COPY

**CERTIFIED MAIL NO. 7009 1680 0000 9456 3327**

David T. Dorko  
INDSPEC Chemical Corp.  
c/o Glenn Springs Holdings, Inc.  
2480 Fortune Drive, Suite 300  
Lexington, KY 40509-4125

Re: ECP - Special Projects - Act 2  
Deficiency Letter-Remedial Investigation Report  
Beazer/INDSPEC Properties  
Primary Facility No. 625299  
Activity ID No. 30980  
Route 268 Main Street  
Fairview Township and Borough of Petrolia, Butler County

Dear Mr. Tischuk and Mr. Dorko:

The Department of Environmental Protection ("Department") has reviewed the document titled "Remedial Investigation Report-Beazer/INDSPEC Properties" submitted on February 22, 2010 (administratively complete on March 4, 2010) for the site located at Route 268 Main Street, Fairview Township and Petrolia Borough, Butler County. The document addresses the remedial activities conducted on the site. The report was submitted on your behalf by Langan Engineering and Environmental Services, Inc.

The Department has decided to place a hold on the review of the report due to what the Department believes is substantive deficiencies. This approach is an effort to expedite the completion of your report and is outlined more fully in the Department's Secretary's Enhancements report of February 2004. This report can be viewed at the Land Recycling Program homepage.

The deficiencies noted are as follows:

### **Incomplete Site Conceptual Model**

There has been approximately 100 years of industrial activity on this site. However, the report does not discuss the industrial use activities and processes associated with the current and previous owners of the site. The site conceptual model ("SCM") should clearly provide for a conceptual understanding of pathway interrelations and should include aspects pertaining to both human health and ecological risk at the site. There is no discussion of the relationship between historic releases, site use, impacted media of concern, and dates of releases. There is no justification or rationale provided for determining each area of interest ("AOI") or suspected source area.

Isoconcentration maps are important in depicting concentrations of contaminants and showing both horizontal and vertical delineation as well as contaminant migration. These maps are important in the development of the SCM and should be included in the re-submission.

Similarly, the exposure evaluation narrative that is provided in the report does not consider all pathways and potential receptors. Because identified pathways such as sediment and surface water (i.e. reservoirs) were not included in the evaluation of the site, potential receptors were not identified and evaluated.

Furthermore, a listing of environmental assessment reports completed on the site was included in the RI. However, none of the data of those assessments were included in the report. If historical data was used in any manner for completing the remedial investigation activities on the site, then that information should be included in the RI in accordance with 25 Pa. Code §250.408(b).

Refer to the TGM, Chapter 250 Regulations, Act 2, and relative EPA Guidance documents to develop a Site Conceptual Model that is appropriate for this site.

### **Ecological Screening Assessment**

The ecological screening assessment should be performed in accordance with the Land Recycling Technical Guidance Manual ("TGM"), which includes but is not limited to identifying pathways and potential receptors as well as performing a PNDI project planning environmental review. The report lacks the proper documentation that demonstrates that the screening assessment was performed in accordance with the TGM.

### **Exposure Evaluation**

The exposure evaluation is incomplete in this report because of the lack of evaluating all pathways and potential receptors. Additionally, the exposure evaluation assessment should be



completed in both narrative and graphical (i.e.: flowchart) form. A complete and accurate exposure evaluation will determine the basis for the completion of any risk assessment report that may follow. This deficiency should be corrected and the information included in the report.

### **Vapor Intrusion**

The report indicates that no receptors were identified within 100 ft. of any of the exceedences of the vapor screening criteria identified during Beazer's screening assessment. However, the two borings that were identified as exceeding EPA PEL's for 1,2-dichlorobenzene were sampled and analyzed at a depth beyond 5.0 ft. A review of these boring logs indicated that there were intervals encountered near the surface that had a 'strong odor and staining.' Yet these intervals were not sampled or analyzed. Furthermore, the presence of preferential pathways negates the use of the vapor screening matrix. Therefore, all of the samples should be re-evaluated to determine if the Department's Vapor Intrusion Guidance screening matrix was appropriately applied. For samples where it is determined that it was not appropriately applied, soil vapor gas or indoor air sampling should be performed for characterization purposes.

### **Surface Soils**

Surface soil impacts exceed the Medium Specific Concentration ("MSCs") in the southern portion of the site and will be remediated. However, delineation sampling was not performed as part of the site characterization to determine the aerial extent (both vertically and horizontally) of contamination. In accordance with 25 Pa. Code §250.408(d), an appropriate number of samples should be taken both inside and outside of the area that exceeds the standard for concentrations of regulated substances. This information should have been part of the characterization activities and the results submitted in the Remedial Investigation Report.

### **Sediment Sampling**

Sediment sampling was not performed on site as indicated in the work plan. All potential areas that receive sediment should be sampled, analyzed, and characterized for all contaminants of concern ("COCs") which are listed in the 1987 Consent Order and Agreement ("COA"), including but not limited to resorcinol, sulfonic acids, TCL Volatiles, TCL Semi-volatiles, and TAL Metals. Additionally, because of the close proximity of the samples containing Dibenzofurans to the South Branch of Bear Creek, Dioxin and Total Organic Carbon ("TOC") sampling should be performed on the stream sediments in addition to the listed COCs.

### **Analytical Results and Third Party Validation Comments**

Five percent of the collected data was third party validated in accordance with the work plan. The validator, Environmental Standards, Inc. noted several issues with the evaluated data. Some of the issues noted by the validator included the following: exceeded holding times, blank

contamination, very low, low, and high matrix spike recoveries, laboratory and field duplicate imprecision, calibrations issues, positive results reported above the instrument calibration range and positive results reported below the sample specific reporting limits. The validator also noted that no explanation was given as to whether or not the data issues were due to matrix interferences or an analytical issue. Considering the issues with data quality the RIR should include discussions regarding data usability, precision, accuracy and how issues with 5% validated data reflect on 95% of the data that was not validated.

Tables 4, 7, 8, 9, 10, 12, and 13 have many samples listed for soil and groundwater matrices that have parameters designated "NM" (not measured) or stated compounds of concern designated "NA" (not analyzed). There is really no purpose to show this data if no information can be obtained from these discreet efforts.

Furthermore, in the "Response to Comments and Conditions on Work Plan for Site Characterization-Beazer/INDSPEC Properties" letter dated March 2, 2004, Beazer indicated that Exygen Research was analyzing the sulfonates and the resorcinol utilizing an enhanced version of the CAA-100.1 method. This was done in an attempt to provide lower detection limits and reduce the impact of matrix interferences. However, it would appear that the analyses failed to reduce these impacts.

Tables 7, 8, and 9 have many samples listed for soil and groundwater matrices that are qualified as "ND" (non-detect) when the report limits ("RL") are, often, magnitudes higher than the MSCs.

At the very least, given the presentation of the data in addition to the third party validator comments, the validity of the data as well as the site's characterization is questionable.

### **Groundwater**

Groundwater was not characterized in accordance with 25 Pa. Code §250.408(e) and the TGM.

As noted in our meeting on May 18, 2010, Beazer is a person that has participated in the remediation of groundwater within the public water service area established under the Hazardous Sites Cleanup Act (HSCA) Operable Unit 2 response for the Bear Creek Area Chemical Site. Beazer has liability protection under Section 501 of Act 2 for releases of the COCs affecting groundwater within the public water service area. Accordingly, groundwater within the public water service area should not be a media of concern in the present remediation except for the purpose of demonstrating attainment with surface water standards.

### **Reservoirs**

All reservoirs should be evaluated and addressed as pathways and receptors for both ecological and human health. The response letter summarized that there is no evidence of any type of impacts in the vicinity of the dam reservoirs upon aerial photo review, and that there is no access to the reservoirs. However, only one reservoir has restricted access and the other two do not. Furthermore, the largest of the reservoirs has been indicated (work plan Figure D2) as being a potential source area from discharges of contaminated boiler blowdown. Therefore, all reservoirs should be evaluated and addressed as pathways and receptors for both ecological and human health.

Furthermore, the report references the 2004 Public Health Assessment Report ("PHA") for the Bear Creek Chemical Area prepared by the Agency for the Toxic Substances and Disease Registry ("ATSDR"). The PHA indicates that the data utilized for its conclusions came from the data available at that time from the Kelly Farm, Hemlock Road, and Apple Road Sites. The report should explain how exposure scenarios and contaminant levels found at the Indspec facility would not be different from the information utilized for the PHA .

Also, page 16 of the PHA indicated that impacts to surface water bodies, in particular, those utilized for swimming or fishing have not been assessed. Under the Recommendations Section on Page 32 of the PHA, the ATSDR recommended doing full scan analyses for surface water bodies utilized for swimming and/or fishing that may have been impacted by site activities. Additionally, the PHA further recommended fish tissue study for waters used for fishing that are contaminated with chemicals known to be bioaccumulative. The ATSDR recommendations are critical in addressing the onsite reservoirs.

### **In-stream Sampling**

Beazer indicated that in stream sampling of the 'free-phase' product was performed. However, Beazer did not screen the sample results against the appropriate screening criteria because they indicated that it was a separate phase product and claimed that it was not part of any media of concern. The 'free-phase' material is not a non-aqueous phase liquid ("NAPL") as indicated in Table 10b. Furthermore, a review of the sample results indicated that many of the COCs exceeded their 25 Pa. Code Chapter §16 water quality criteria. Therefore, the Table 10b values should be screened against the 25 Pa. Code Chapter §16 surface water criteria to determine any exceedences, documented, and reported in the revised RI.

Furthermore, the report lacks the documentation of source characterization as well as remedial alternatives in accordance with 25 Pa. Code §250.408. This information concerning the ongoing releases to the South Branch of Bear Creek as well as other releases to the site should be submitted in the revised RIR.

### **Outfalls and Discharges**

During a Department investigation of the South Branch of Bear Creek, it was discovered that there are at least 29 outfalls and two NPDES discharges at the INDSPEC plant. However, there is no discussion in the report of these outfalls and discharges or how they may impact the site. This information should be included in the re-submittal as part of the SCM.

### **PENTOX**

PENTOX modeling of groundwater discharge to surface water was performed by Langan Engineering. Through Langan's modeling efforts, Beazer concluded that groundwater discharge exceeded the waste allocation load for resorcinol in a discreet area of AOI 1. However, in-stream surface water sampling detected exceedences of resorcinol magnitudes higher than Beazer's consultant, AMEC's, proposed water quality criteria. Moreover, other contaminants such as Benzene (which has been historically released on the site) exceeded the 25 Pa. Code §16 cancer risk level for Water Quality Criteria of Toxic Substances (Appendix A, Table 1). Because of the lack of conformity between the PENTOX output values and the actual surface water values, and the exceedences of the in-stream surface water criteria for many substances, use of the PENTOX model is not considered appropriate for this site.

### **Tear Gas Components**

The Work Plan indicated that the tear gas components were 'unidentified.' However, the RI listed two components that were analyzed for tear gas: chloroacetophenone and hydroxyacetophenone. However, there is no discussion in the report why these substances were chosen for analysis during sampling of the filter cake disposal area. Rationale for sampling and analysis of these substances should be included in the RI re-submittal.

### **Sampling Dates**

Sampling dates for soils is unknown according to the lack of dates on the tabled data. Groundwater sampling was last performed in 2006. Beazer should explain in the RI if there has been any release to the site since the last sampling dates for soil, groundwater, sediment, and surface water. If there have been releases, Beazer should explain why there has not been further sampling since the time of those releases in the revised RI.

Thank you for your cooperation in working with the Department in the remediation of this site. If you have any questions or need further information regarding this matter, please contact Kristie Shimko at 814.332.6189.

Sincerely,

A handwritten signature in black ink, appearing to read "John O'Hara", written in a cursive style.

John O'Hara  
Professional Engineer  
Environmental Cleanup

cc: Colleen Costello, P.G.  
Kristie Shimko  
File

JOH:lsf

**Response to PADEP Review Letter to  
2009 Remedial Investigation Report**

**APPENDIX A**  
**RESPONSE TO PADEP COMMENT LETTER TO 2009 RIR**  
**BEAZER/INDSPEC PROPERTIES**  
**PETROLIA, PENNSYLVANIA**

The following details Beazer/INDSPEC's responses to the PADEP 2009 RIR Comment Letter.

**Incomplete Site Conceptual Model**

PADEP Comment:

1. *There has been approximately 100 years of industrial activity on this site. However, the report does not discuss the industrial use activities and processes associated with the current and previous owners of the site.*

Response:

The following sections list where current and historical industrial processes are addressed in the revised RIR;

- Section 2.3 (Surrounding Properties) discusses operations at surrounding properties.
- Section 3.1 (Site Use and Ownership History) discusses current and previous operations and processes at the Facility Site.
- Section 3.2 (Historical Environmental Investigations) and Appendix E (Site Historical Information, 2003 Site Characterization Workplan, Supplemental RI Workplans, Occupied Buildings and Underground Utilities) summarizes the environmental investigations that were completed due to former operations. The RIR presents that these historical reports were the basis of the selection of sampling locations in the 2003 Workplan but the data from those investigations are not used in the RIR as data points for characterization.

PADEP Comment:

2. *The site conceptual model ("SCM") should clearly provide for a conceptual understanding of pathway interrelations and should include aspects pertaining to both human health and ecological risk at the site. There is no discussion of the relationship between historic releases, site use, impacted media of concern, and dates of releases.*

Response:

Section 11 (Site Conceptual Model), Table 14 (Summary of Exposure Pathway Assessment), Section 12 (Exposure Assessment) and Figure 20 (Diagram for an Exposure Pathway Assessment) describe where the SCM and Exposure Assessment provide a conceptual understanding of pathway interrelations pertaining to human health and ecological risk in text, tabular and graphical format. The revised SCM and Exposure Assessment include discussion of potential source areas, site use, media, pathways and receptors.

PADEP Comment:

3. *There is no justification or rationale provided for determining each area of interest ("AOI") or suspected source area.*

Response:

Section 1 (Introduction), Section 5 (Technical Approach) and Appendix E of the revised RIR presents the rationale for the selection of the suspected source areas and the Areas of Interest.

PADEP Comment:

4. *Isoconcentration maps are important in depicting concentrations of contaminants and showing both horizontal and vertical delineation as well as contaminant migration. These maps are important in the development of the SCM and should be included in the re-submission.*

Response:

Isoconcentration maps are included in the revised RIR to show horizontal and vertical delineation for the most prevalent COCs in groundwater (1,2-DCB, THD, BSA, m-BDSA, m&p-PSA and resorcinol) at the Facility Site (Figures 17b-17i).

PADEP Comment:

5. *Similarly, the exposure evaluation narrative that is provided in the report does not consider all pathways and potential receptors. Because identifies pathways such as sediment and surface water (i.e. reservoirs) were not included in the evaluation of the site, potential receptors were not identified and evaluated.*



Response:

Section 11, 12 and 13 (Ecological Risk Assessment) have been revised and include a discussion of all exposure pathways (including surface water and sediment). These pathways are also shown on Table 14 and Figure 20.

PADEP Comment:

6. *Furthermore, a listing of environmental assessment reports completed on the site was included in the RI. However, none of the data of those assessments were included in the report. If historical data was used in any manner for completing the remedial investigation activities on the site, then that information should be included in the RI in accordance with 25 Pa. Code §250.408(b).*

Response:

Appendix E has been revised to include all of the historical data from the historical reports included in the 2003 Work Plan for reference, but the historical data is not included in the RIR data set to support characterization.

PADEP Comment:

7. *Refer to TGM, Chapter 250 Regulations, Act 2, and relative EPA Guidance documents to develop a Site Conceptual Model that is appropriate for this site.*

Response:

Sections 11, 12 and 13 have been revised to include reference to the TGM, Chapter 250 regulations and EPA guidance. These sections present a SCM in accordance with these references.

## **Ecological Screening Assessment**

### **PADEP Comment:**

*The ecological screening assessment should be performed in accordance with the Land Recycling Technical Guidance Manual ("TGM"), which includes but is not limited to identifying pathways and potential receptors as well as performing a PNDI project planning environmental review. The report lacks the proper documentation that demonstrates that the screening assessment was performed in accordance with the TGM.*

### **Response:**

Section 10.0 (Ecological Screening Assessment) of the revised RIR presents the PNDI results and the ecological screening assessment which was completed in general accordance with the TGM. Section 13 follows and quotes the TGM for the ecological assessment.

## **Exposure Evaluation**

### **PADEP Comment:**

*The exposure evaluation is incomplete in this report because of the lack of evaluating all pathways and potential receptors. Additionally, the exposure evaluation assessment should be completed in both narrative and graphical (i.e.: flowchart) form. A complete and accurate exposure evaluation will determine the basis for the completion of any risk assessment report that may follow. This deficiency should be corrected and the information included in the report.*

### **Response:**

Section 11, Table 14, Section 12 and Figure 20 of the revised RIR discuss all pathways and potential relationships with receptors in text, tabular and graphical format (i.e. flowchart). Based on this assessment, ecological risk assessment activities were completed as documented in Section 13.

## **Vapor Intrusion**

### **PADEP Comment:**

*The report indicates that no receptors were identified within 100ft. of any of the exceedences of the vapor screening criteria identified during Beazer's screening assessment. However, the two borings that were identified as exceeding EPA PEL's for 1,2-dichlorobenzene were sampled and analyzed at a depth beyond 5.0ft. A review of these boring logs indicated that there were intervals encountered near the surface that had a "strong odor and staining." Yet these intervals were not sampled or analyzed. Furthermore, the presence of preferential pathways negates the use of vapor screening matrix. Therefore, all of the samples should be re-evaluated to determine if the Department's Vapor Intrusion Guidance screening matrix was appropriately applied. For samples where it is determined that it was not appropriately applied, soil vapor gas or indoor air sampling should be performed for characterization purposes.*

### **Response:**

The RIR has been revised to eliminate use of the vapor screening matrix for soil and groundwater. Soil gas sampling was completed in 2012 (since the last submittal of the RIR) and the results of the soil gas sampling are summarized in Section 7.0 (Remedial Investigation Results). In addition, the revised RIR states that all potential vapor exposure pathways will be addressed by mitigation measures as necessary.

## **Surface Soil**

### **PADEP Comment:**

*Surface soil impacts exceed the Medium Specific Concentration ("MSCs") in the southern portion of the site and will be remediated. However, delineation sampling was not performed as part of the site characterization to determine the aerial extent (both vertically and horizontally) of contamination. In accordance with 25 Pa. Code §250.408(d), an appropriate number of samples should be taken both inside and outside of the area that exceeds the standard for concentrations of regulated substances. This information should have been part of the characterization activities and the results submitted in the Remedial Investigation Report.*

### **Response:**

Additional soil delineation was completed since the last submittal of the RIR (2010). Section 1.5 (Remedial Investigation Work Plan), Section 4.4 (Installation of Asphalt Cap), 6.3.1 (AOI 1 - Borings and Samples), and 7.2 (Soil Results) of the revised RIR discuss the delineation soil

sampling and presents the soil delineation results. Soils in this area were addressed by the installation of an asphalt cap once the delineation sampling was completed. Section 11 and 12 discusses how this area was addressed in the Exposure Assessment and the Site Conceptual Model.

### **Sediment Sampling**

PADEP Comment:

*Sediment sampling was not performed on site as indicated in the work plan. All potential areas that receive sediment should be sampled, analyzed, and characterized for all contaminants of concern ("COCs") which are listed in the 1987 Consent order and Agreement ("COA"), including but not limited to resorcinol, sulfonic acids, TCL Volatiles, TCL Semi-volatiles, and TAL Metals. Additionally, because of the close proximity of the samples containing Dibenzofurans to the South Branch of Bear Creek, Dioxin and Total Organic Carbon ("TOC") sampling should be performed on the stream sediments in addition to the listed COCs.*

Response:

Sections 6.0 (Remedial Investigation Activities), Section 7.0, Appendix E and Appendix J (Analytical Data Summary Tables and Figures and Complete Laboratory Analytical Data Packages) have been revised in the RIR to summarize the sediment sampling and sediment results from the South Branch of Bear Creek and the reservoirs. These sections include data included in the original RIR as well as additional sediments data collected from the reservoirs in 2010. Samples were analyzed for TOC in accordance with the 2003 Work Plan. Samples were not analyzed for dioxins since dioxin was not included as a COC in the 2003 Consent Order and Agreement or in the 2003 Workplan and dioxin is not proposed to be included in the eventual request for the Release of Liability.

### **Analytical Results and Third Party Validation Comments**

PADEP Comment:

*Five percent of the collected data was third party validated in accordance with the work plan. The validator, Environmental Standards, Inc. noted several issues with the evaluated data. Some of the issues noted by the validator included the following: exceeded holding times, blank contamination, very low, low and high matrix spike recoveries, laboratory and field duplicate imprecision, calibration issues, positive results reported above the instrument calibration range and positive results reported below the sample specific reporting limits. The validator also noted that no explanation was given as to whether or not the*

*data issues were due to matrix interferences or an analytical issue. Considering the issues with the data quality the RIR should include discussions regarding data usability, precision, accuracy and how issues with 5% validated data reflect on the 95% of the data that was not validated.*

Response:

Section 8.0 (Quality Assessment/Quality Control and Data Usability) has been revised to include the Quality Assurance, Quality Control and Data Usability Analysis which supported that 99.8% of the data is useable. This evaluation and summary was discussed and submitted to the PADEP prior to the submission of the revised RIR.

PADEP Comment:

*Tables 4, 7, 8, 9, 10, 12, and 13 have many samples listed for soil and groundwater matrices that have parameters designated "NM" (not measures) or stated compounds of concern designated "NA" (not analyzed). There is really no purpose to show this data if no information can be obtained from these discreet efforts.*

Response:

These tables were revised and do not include "NM" or "NA". These tables were reviewed with the PADEP prior to the submission of the revised RIR.

PADEP Comment:

*Furthermore, in the "Response to Comments and Conditions on Work Plan for Site Characterization-Beazer/INDSPEC Properties" letter dated March 2, 2004, Beazer indicated that Exygen Research was analyzing the sulfonates and the resorcinol utilizing an enhanced version of the CAA-100.1 method. This was done in an attempt to provide lower detection limits and reduce the impact matrix interferences. However, it would appear that the analyses failed to reduce these impacts.*

Response:

Section 8 of the revised RIR specifically addresses the detections limits in the data useability discussion and supports that the overwhelming majority of the data is useable and that the enhanced version of CAA-100.1 was successful in achieving lower detection limits.

PADEP Comment:

*Tables 7, 8, and 9 have many samples listed for soil and groundwater matrices that are qualified as "ND" (non-detect) when the report limits ("RL") are, often, magnitudes higher than the MSCs.*

Response:

The data tables highlight when the RL is above the MSC in the revised RIR, but maintains a ND result if that what was reported by the laboratory. Site characterization data that had RLs below the MSC were used for Act 2 site characterization.

**Groundwater**

PADEP Comment:

*Groundwater was not characterized in accordance with 25 Pa. Code §250.408(e) and the TGM.*

Response:

Section 7 presents the results of the groundwater results in accordance with Code 250 and the TGM for the groundwater units and COCs that are to be ultimately included in the request for the Release of Liability. This is supported by Section 2.5 (Hydrogeology) and Section 11. In addition, as noted in the PADEP comment quoted immediately below, groundwater within the public water service area is not a media of concern except for the purpose of demonstrating attainment with surface water standards.

PADEP Comment:

*As noted in our meeting on May 18, 2010, Beazer is a person that has participated in the remediation of groundwater within the public water service area established under the Hazardous Sites Cleanup Act (HSCA) Operable Unit 2 response for the Bear Creek Area Chemical Site. Beazer has liability protection under Section 501 of Act 2 for releases of the COCs affecting groundwater within the public water service area. Accordingly, groundwater within the public water service area should not be a media of concern in the present remediation except for the purpose of demonstrating attainment with surface water standards.*

Response:

Beazer and Indspec are in agreement that liability protection under Section 501 of Act 2 exists for any releases of the COCs affecting groundwater within the public water service area and

groundwater is not a media of concern except for the purpose of demonstrating attainment with surface water standards.

### **Reservoirs**

PADEP Comment:

*All reservoirs should be evaluated and addressed as pathways and receptors for both ecological and human health. The response letter summarized that there is no evidence of any type of impacts in the vicinity of the dam reservoirs upon aerial photo review, and that there is no access to the reservoirs. However, only one reservoir has restricted access and the other two do not. Furthermore, the largest of the reservoirs has been indicated (work plan Figure D2) as being a potential source area from discharges of contaminated boiler blowdown. Therefore, all reservoirs should be evaluated and addressed as pathways and receptors for both ecological and human health.*

Response:

Section 5.1.4 (Technical Approach, AOI 4) has been revised to clarify that the boiler blowdown was discharged in AOI 2 reservoir and not to the AOI 4 reservoir. Additional sampling was completed (2010) in the reservoirs since the last submittal of the RIR. Section 6, Section 11, Section 12, Appendix M (Ecological Screening Tables and Figures) and Appendix J evaluate the reservoirs in relation to pathways and receptors.

PADEP Comment:

*Furthermore, the report references the 2004 Public Health Assessment Report ("PHA") for the Bear Creek Chemical Area prepared by the Agency for the Toxic Substances and Disease Registry ("ATSDR"). The PHA indicates that the data utilized for its conclusions came from the data available at that time from the Kelly Farm, Hemlock Road and Apple Road Sites. The report should explain how exposure scenarios and contaminate levels found at the Indspec facility would not be difference from the information utilized for the PHA.*

Response:

Section 7.0, 11.0 and 12.0 summarizes and evaluates the results from the site characterization activities in relation to the PHA in the revised RIR.

PADEP Comment:

*Also, page 16 of the PHA indicated that impacts to surface water bodies, in particular, those utilized for swimming or fishing have not been assessed. Under the Recommendations Section on Page 32 of the PHA, the ATSDR recommended doing full scan analyses for surface water bodies utilized for swimming and/or fishing that may have been impacted by site activities. Additionally, the PHA further recommended fish tissue study for waters used for fishing that are contaminated with chemicals known to be bioaccumulative. The ATSDR recommendations are critical in addressing the onsite reservoirs.*

Response:

Section 12.0, Appendix M and Appendix J address the ATSDR comments for surface water bodies. Specifically Section 12.4.1 states the lack of potential for the specialty compounds to bioaccumulate due to their having an octanol/water partition coefficient (log Kow) less than 4. In addition the ATSDR PHA also concluded the fish consumption pathway is incomplete for the specialty compounds:

*“Game animals and fish become contaminated by ingesting contaminated plants. Water, or animals, or, for fish, by living in contaminated water.....People then become exposed by ingesting the contamination that bioaccumulates in plants or animals. After a review of available data, however, no bioaccumulation is expected to occur at this site. Because the contaminants of concern at the site do not tend to bioaccumulate in plants or animals, people are not likely to be exposed to contaminants through food chain uptake.” (PHA, Eliminated Exposure Pathways section, p. 12).*

Section 12 and Appendix E address this issue in additional detail in the revised RIR.

### **In-stream Sampling**

PADEP Comment:

*Beazer indicated that in stream sampling of the “free-phase” product was performed. However, Beazer did not screen the sample results against the appropriate screening criteria because they indicated that it was a separate phase product and claimed that it was not part of any media of concern. The “free-phase” material is not a non-aqueous phase liquid (“NAPL”) as indicated in Table 10b. Furthermore, a review of the sample results indicated that many of the COCs exceeded their 25 Pa. Code Chapter §16 water quality criteria. Therefore, the Table 10b values should be screened against the 25 Pa. Code Chapter §16 surface water criteria to determine any exceedences, documented, and reported in the revised RI.*



Response:

Section 6.12 (Free Phase Sampling) and 7.7 (Free Phase Results) summarizes the free phase sampling and re-iterates why it is not appropriate to compare these results to the surface water screening criteria in the revised RIR.

PADEP Comment:

*Furthermore, the report lacks the documentation of source characterization as well as remedial alternatives in accordance with 25 Pa. Code §250.408. This information concerning the ongoing releases to the South Branch of Bear Creek as well as other releases to the site should be submitted in the revised RIR.*

Response:

Section 6.0 and 7.0 in the revised RIR document the source characterization that supported the AquaBlok® remedial measure in the South Branch of Bear Creek. Section 4.0 (Summary of Completed Interim and Final Remedies) summarizes the remedial action for the free phase material. Section 3.2 (Historical Release Investigations) summarizes the other documented releases and the interim remedial measures conducted since the 2003 Work Plan.

### **Outfalls and Discharges**

PADEP Comment:

*During a Department investigation of the South Branch of Bear Creek, it was discovered that there are at least 29 outfalls and two NPDES discharges at the INDSPEC plant. However, there is no discussion in the report of these outfalls and discharges or how they may impact the site. This information should be included in the re-submittal as part of the SCM.*

Response:

Section 2.6 (Surface Water), 7.5 (Surface Water Results), 7.6 (Sediment Results) and Figure 11 have been revised to present the outfall locations and discuss the lack of correlation between the outfalls and the presence of COCs.

**PENTOX****PADEP Comment:**

*PENTOX modeling of groundwater discharge to surface water was performed by Langan Engineering. Through Langan's modeling efforts, Beazer concluded that groundwater discharge exceeded the waste allocation load for resorcinol in a discrete area of AOI 1. However, in-stream surface water sampling detected exceedences of resorcinol magnitudes higher than Beazer's consultant, AMEC's, proposed water quality criteria. Moreover, other contaminants such as Benzene (which has been historically released on the site) exceeded the 25 Pa. Code §16 cancer risk level for Water Quality Criteria of Toxic Substances (Appendix A, Table 1). Because of the lack of conformity between the PENTOX output values and the actual surface water values, and the exceedences of the in-stream surface water criteria for many substances, use of the PENTOX model is not considered appropriate for this site.*

**Response:**

The AquaBlok® remedy was implemented in 2011 (after submittal of the previous RIR). Section 9 (Fate and Transport Analysis) summarizes the revised PENTOX analysis based on the AquaBlok® remedy. This section also includes statements explaining why PENTOX is appropriate for this evaluation.

**Tear Gas Components****PADEP Comment:**

*The Work Plan indicated that the tear gas components were "unidentified." However, the RI listed two components that were analyzed for tear gas: chloroacetophenone and hydroxyacetophenone. However, there is no discussion in the report why these substances were chosen for analysis during sampling of the filter cake disposal area. Rationale for sampling analysis of these substances should be included in the RI re-submittal.*

**Response:**

Section 5.0 (Technical Approach) has been revised to summarize the tear gas sampling rationale and analysis in the revised RIR.

**Sampling Dates****PADEP Comment:**

*Sampling dates for soils is unknown according to the lack of dates on the tabled data. Groundwater sampling was last performed in 2006. Beazer should explain in the RI if there has been any release to the site since the last sampling dates for soil, groundwater, sediment, and surface water. If there have been releases, Beazer should explain why there has not been further sampling since the time of those releases in the revised RI.*

**Response:**

Tables 9 and 10 were revised to include the soil sampling dates. Section 3.0 (Site History and Background) in the revised RIR summarizes all known releases up to the submittal of the revised RIR.

## **Notice of Submittal of 2013 Remedial Investigation Report**

March 1, 2013

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Margaret Merryman, Secretary  
Petrolia Borough  
PO Box 333  
Petrolia, PA 16050

Jeff Larimore, Council President  
Petrolia Borough  
PO Box 333  
Petrolia, PA 16050

**RE: Notice of Submittal of Remedial Investigation Report  
INDSPEC Chemical Corporation Property and Beazer East, Inc.  
Property  
Petrolia, Butler County, Pennsylvania  
Langan Project No.: 2568418**

Dear Ms. Merryman and Mr. Larimore:

Notice is hereby given that INDSPEC Chemical Corporation (INDSPEC) and Beazer East, Inc. (Beazer) have submitted a remedial investigation report to the Department of Environmental Protection for the INDSPEC Chemical Corporation property and Beazer East, Inc. property located in Petrolia, Butler County, Pennsylvania. The report advises that the remediation planned will attain compliance with a combination of the site-specific, and the statewide health cleanup standards.

This notice is made under the provision of the Land Recycling and Environmental Standards Act, the Act of May 19, 1995, P.L. #4, No. 2.

Sincerely,  
**Langan Engineering and Environmental Services, Inc.**



Colleen Costello, P.G.  
Managing Principal

cc: Jane Patarcity  
George Luxbacher  
Joel Lennen, Esquire  
S. Craig Lobins

March 1, 2013

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William C. Brown, Chairman  
Fairview Township Board of Supervisors  
Fairview Township Municipal Building  
1571 Hooker Road  
Karns City, PA 16041

**RE: Notice of Submittal of Remedial Investigation Report  
INDSPEC Chemical Corporation Property and Beazer East, Inc.  
Property  
Petroia, Butler County, Pennsylvania  
Langan Project No.: 2568418**

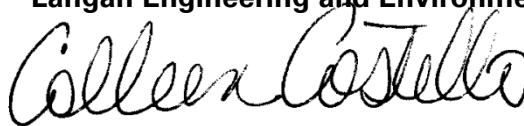
Dear Mr. Brown:

Notice is hereby given that INDSPEC Chemical Corporation (INDSPEC) and Beazer East, Inc. (Beazer) have submitted a remedial investigation report to the Department of Environmental Protection for the INDSPEC Chemical Corporation property and Beazer East, Inc. property located in Petroia, Butler County, Pennsylvania. The report advised that the remediation planned will attain compliance with a combination of the site-specific, and the statewide health cleanup standards.

This notice is made under the provision of the Land Recycling and Environmental Standards Act, the Act of May 19, 1995, P.L. #4, No. 2.

Sincerely,

**Langan Engineering and Environmental Services, Inc.**



Colleen Costello, P.G.  
Managing Principal

cc: Jane Patarcity  
George Luxbacher  
Joe Reinhart, Esquire  
Joel Lennon, Esquire  
S. Craig Lobins

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Margaret Merryman, Secretary  
Jeff Larimore, Council President  
Petrolia Borough  
PO Box 333  
Petrolia, PA 16050

2. Article Number  
(Transfer from service label)

7012 2210 0000 1980 3503

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Leg Merryman

☐ Agent☐ Addressee

B. Received by (Printed Name)

Leg Merryman Jr

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ YesU.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	\$ -46
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.11



Sent To William C. Brown, Chairman  
Fairview Twp Board of Supervisors  
Fairview Twp. Municipal Building  
1571 Hooker Road  
Karns City, PA 16041

PS Form 3800, August 2006

See Reverse for Instructions

U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	\$ .46
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.11



Sent To Margaret Merryman, Secretary  
Jeff Larimore, Council President  
Petrolia Borough  
PO Box 333  
Petrolia, PA 16050

PS Form 3800, August 2006

See Reverse for Instructions

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1. Article Addressed to:

William C. Brown, Chairman  
Fairview Twp Board of Supervisors  
Fairview Twp. Municipal Building  
1571 Hooker Road  
Karns City, PA 16041

2. Article Number  
(Transfer from service label)

7012 2210 0000 1980 3510

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Paul E Dore

☐ Agent☐ Addressee

B. Received by (Printed Name)

Paul E Dore

C. Date of Delivery

3-7-13

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

**Notification of Receipt  
of Remedial Investigation Report**

Notice is hereby given that INDSPEC Chemical Corporation (INDSPEC) and Beazer East, Inc. (Beazer) have submitted a Remedial Investigation Report to the Pennsylvania Department of Environmental Protection, Northwest Regional Office for a site located in Petrolia, Butler County, Pennsylvania. INDSPEC and Beazer have advised in the Remedial Investigation Report that site characterization activities have been completed at the site in accordance with the Land Recycling and Environmental Remediation Standards Act and the Facility Lead Agreement for this site. This notice is made under the provision of the Land Recycling and Environmental Remediation Standards Act, the Act of May 19, 1995, P.L. #4, No. 2.



# Proof of Publication of Notice in Butler Eagle

Under Act No. 587, Approved May 16, 1929

State of Pennsylvania,  
County of Butler.

Sarah I. Dobson Of the Eagle Printing Company, Inc., of the County and State aforesaid, being duly sworn, deposes and says that the BUTLER EAGLE, a newspaper of general circulation published at 114 West Diamond Street, City of Butler, County and State aforesaid, was established 1869, since which date the BUTLER EAGLE has been regularly issued in said County, and that the printed notice or publication attached hereto is exactly the same as was printed and published in the regular editions and issues of the said BUTLER EAGLE on the following dates, viz.

\_\_\_\_\_ and the  
\_\_\_\_\_ 7th \_\_\_\_\_ Day of March \_\_\_\_\_ A.D. 2013

Affiant further deposes that the Ad Taker is duly authorized by the EAGLE PRINTING COMPANY, a corporation, publisher of said BUTLER EAGLE, a newspaper of general circulation, to verify the foregoing statement under oath, and Affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statements as to time, place and character of publication are true.

## Copy of Notice or Publication

**LEGAL NOTICE**  
Notification of Receipt  
of Remedial  
Investigation Report  
Notice is hereby given  
that INDSPEC Chemical  
Corporation (INDSPEC)  
and Beazer East, Inc.  
(Beazer) have submitted  
a Remedial Investigation  
Report to the Pennsylvania  
Department of Environmental  
Protection, Northwest  
Regional Office for a site located in  
Petrolia, Butler County,  
Pennsylvania. INDSPEC  
and Beazer have  
advised in the Remedial  
Investigation Report that  
site characterization  
activities have been  
completed at the site in  
accordance with the  
Land Recycling and  
Environmental Remediation  
Standards Act and the  
Facility Lead Agreement  
for this site. This  
notice is made under the  
provision of the Land  
Recycling and Environmental  
Remediation Standards  
Act, the Act of May 19,  
1995, P.L. #4, No.2.

Sarah I. Dobson  
Butler Eagle

Sworn to and subscribed before me this 7th  
Day of March \_\_\_\_\_ 2013

My Commission Expires: \_\_\_\_\_  
Notary Public

RONALD A. WODENICHAR  
Notary Public  
BUTLER CITY, BUTLER COUNTY  
My Commission Expires Jul 17, 2016

## Statement of Advertising Costs

Langan

PO Box 1569

Doylestown, PA 18901

TO BUTLER EAGLE, Dr.  
For publishing the notice or publication attached  
Hereto on the above stated dates \$ 70.00  
Probating same \$ 2.00  
Total \$ 72.00

## Publisher's Receipt for Advertising Costs

The EAGLE PRINTING COMPANY, publisher of the BUTLER EAGLE, a newspaper of general circulation, hereby acknowledge receipt of the aforesaid notice and publication costs and certifies that the same have been duly paid.

EAGLE PRINTING CO., a Corporation, Publisher  
Of BUTLER EAGLE, a Newspaper of General Circulation.

By Glenda M. Stitt